

JS 44 (Rev. 12/12)

**CIVIL COVER SHEET**

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

**I. (a) PLAINTIFFS**

Sherwood DeJoie

**DEFENDANTS**

Bayview Loan Servicing, LLC

(b) County of Residence of First Listed Plaintiff Lehigh  
(EXCEPT IN U.S. PLAINTIFF CASES)

County of Residence of First Listed Defendant Miami Dade County, FL  
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

(c) Attorneys (Firm Name, Address, and Telephone Number)

Richard J. Orloski, Esquire 610-433-2363

111 North Cedar Crest Blvd, Allentown, PA 18104

Attorneys (If Known)

**II. BASIS OF JURISDICTION** (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant
- ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

**III. CITIZENSHIP OF PRINCIPAL PARTIES** (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- |   | PTF                                   | DEF                        |   | PTF                        | DEF                                   |
|---|---------------------------------------|----------------------------|---|----------------------------|---------------------------------------|
| Citizen of This State                   | <input checked="" type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State     | <input type="checkbox"/> 4 | <input type="checkbox"/> 4            |
| Citizen of Another State                | <input type="checkbox"/> 2            | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input checked="" type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3            | <input type="checkbox"/> 3 | Foreign Nation  | <input type="checkbox"/> 6 | <input type="checkbox"/> 6            |

**IV. NATURE OF SUIT** (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<b>PERSONAL INJURY</b> <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/ Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395f) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	<b>PRISONER PETITIONS</b> <b>Habeas Corpus:</b> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <b>Other:</b> <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

**V. ORIGIN** (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from Another District (specify)
- ☐ 6 Multidistrict Litigation

**VI. CAUSE OF ACTION**

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):  
 42 U.S.C. 1981, 15 U.S.C. 1681a, 15 U.S.C. 1692g

Brief description of cause:

Equal Rights Under the Law, Fair Credit Reporting Act, Validation of Debts

**VII. REQUESTED IN COMPLAINT:**

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

**DEMAND \$**

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No

**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE

SIGNATURE OF ATTORNEY OF RECORD

DOCKET NUMBER

15-2340

DATE

May 3 2016

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

FOR THE EASTERN DISTRICT OF PENNSYLVANIA — DESIGNATION FORM to be used by counsel to indicate the category of the case for the purpose of assignment to appropriate calendar.

Address of Plaintiff: 8894 Pathfinder Road, Breinigsville, PA 18031

Address of Defendant: 4425 Ponce de Leon Blvd, 5<sup>th</sup> FL, Coral Gables, FL 33146

Place of Accident, Incident or Transaction: \_\_\_\_\_  
(Use Reverse Side For Additional Space)

Does this civil action involve a nongovernmental corporate party with any parent corporation and any publicly held corporation owning 10% or more of its stock?  
(Attach two copies of the Disclosure Statement Form in accordance with Fed.R.Civ.P. 7.1(a)) Yes ☐ No ☐

Does this case involve multidistrict litigation possibilities? Yes ☐ No ☒

RELATED CASE, IF ANY:

Case Number: \_\_\_\_\_ Judge \_\_\_\_\_ Date Terminated: \_\_\_\_\_

Civil cases are deemed related when yes is answered to any of the following questions:

1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court?  
Yes ☒ No ☐
2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court?  
Yes ☒ No ☐
3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action in this court?  
Yes ☐ No ☒
4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights case filed by the same individual?  
Yes ☐ No ☒

CIVIL: (Place ☒ in ONE CATEGORY ONLY)

A. Federal Question Cases:

1. ☐ Indemnity Contract, Marine Contract, and All Other Contracts
2. ☐ FELA
3. ☐ Jones Act-Personal Injury
4. ☐ Antitrust
5. ☐ Patent
6. ☐ Labor-Management Relations
7. ☒ Civil Rights
8. ☐ Habeas Corpus
9. ☐ Securities Act(s) Cases
10. ☐ Social Security Review Cases
11. ☒ All other Federal Question Cases  
(Please specify) Excluded Reporting Act

B. Diversity Jurisdiction Cases:

1. ☐ Insurance Contract and Other Contracts
2. ☐ Airplane Personal Injury
3. ☐ Assault, Defamation
4. ☐ Marine Personal Injury
5. ☐ Motor Vehicle Personal Injury
6. ☐ Other Personal Injury (Please specify)
7. ☐ Products Liability
8. ☐ Products Liability — Asbestos
9. ☐ All other Diversity Cases  
(Please specify) \_\_\_\_\_

### ARBITRATION CERTIFICATION

(Check Appropriate Category)

I, Richard J. Ocloski,

counsel of record do hereby certify:

☐ Pursuant to Local Civil Rule 53.2, Section 3(c)(2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs;

☒ Relief other than monetary damages is sought.

DATE: \_\_\_\_\_

Attorney-at-Law

09857

Attorney I.D.#

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

I certify that, to my knowledge, the within case is not related to any case now pending or within one year previously terminated action in this court except as noted above. EXCERPT AS NOTED HEREIN - 15-2380

DATE: May 3, 2016

Attorney-at-Law

09857

Attorney I.D.#

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**CASE MANAGEMENT TRACK DESIGNATION FORM**

Sherwood DeJae

v.

Bayview Loan Servicing, LLC.

CIVIL ACTION

NO.

In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a Case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See § 1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a Case Management Track Designation Form specifying the track to which that defendant believes the case should be assigned.

**SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:**

- (a) Habeas Corpus – Cases brought under 28 U.S.C. § 2241 through § 2255. ( )
- (b) Social Security – Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits. ( )
- (c) Arbitration – Cases required to be designated for arbitration under Local Civil Rule 53.2. ( )
- (d) Asbestos – Cases involving claims for personal injury or property damage from exposure to asbestos. ( )
- (e) Special Management – Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.) ( )
- (f) Standard Management – Cases that do not fall into any one of the other tracks. (X)

May 3, 2016  
Date

[Signature]  
Attorney-at-law

Plaintiff  
Attorney for Plaintiff

(610) 433-2363

Telephone

(610) 433-4785

FAX Number

orloski.law@gmail.com

E-Mail Address

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>SHERWOOD DEJOIE,</b>	:	
<b>Plaintiff</b>	:	<b>CIVIL ACTION</b>
	:	
<b>vs.</b>	:	<b>NO.</b>
	:	
<b>BAYVIEW LOAN SERVICING, LLC,</b>	:	<b>JURY TRIAL DEMANDED</b>
<b>Defendants</b>	:	

**COMPLAINT**

**PARTIES**

1. Plaintiff, Sherwood DeJoie, is an adult individual residing at 8894 Pathfinder Road, Breinigsville, Lehigh County, Pennsylvania 18031.

2. Defendant, Bayview Loan Servicing, LLC is a limited liability company with offices located at 4425 Ponce de Leon Blvd., 5<sup>th</sup> Floor, Coral Gables, Florida 33146.

**JURISDICTION AND VENUE**

3. This Honorable Court has jurisdiction over this matter pursuant to 42 U.S.C. 1981 *et seq.* at Count I, and over Count II pursuant to the Fair Credit Reporting Act.

**FACTS**

4. On April 30, 2015, Sherwood DeJoie (“Mr. DeJoie” or “Plaintiff”) filed an action against Defendant under the Fair Credit Reporting Act. See *DeJoie v. Bayview*, No. 15-2390, United States District Court for the Eastern District of Pennsylvania.

5. On December 17, 2015, the parties entered into a confidential Settlement Agreement (the “Agreement”) which discontinued the litigation.

6. One of the terms of the Settlement Agreement was that there was no “amount past due”.

7. As of January 12, 2016, consistent with the Settlement Agreement, Plaintiff's credit report accurately reflected that the past due amount balance was \$0. See Exhibit A, Credit Report as of January 12, 2016.

8. In the March 30, 2016 credit report, Plaintiff's credit report was reverted back to the prior inaccurate amount past due balance of \$8,472.00 and the incorrect monthly payment of \$2,069.00. See Exhibit B, Credit Report as of March 30, 2016.

9. The Defendant erroneously reported two past due amounts on Plaintiff's mortgage which was inaccurate and corrected in the first action.

10. On December 31, 2015, Plaintiff entered into a purchase contract with HomeSnipe Real Estate, LLC for a property located at 1513 Liberator Avenue, Allentown, Pennsylvania 181003, for a purchase price of \$50,000.00.

11. Mr. DeJoie's Agreement was rescinded after the real estate company checked his credit, and saw the false, incorrect information regarding an alleged \$8,472.00 "amount past due" on his mortgage.

12. As a result, Plaintiff lost the opportunity to purchase the realty and lost the benefit of the bargain.

**COUNT I**  
**PURSUANT TO 42 U.S.C. 1981**

13. The preceding paragraphs 1 through 12 are incorporated herein by reference as though fully set forth herein at length.

14. During all times material and relevant, Plaintiff was a member of a protected class based on his race and color, namely, an African American of Haitian descent.

15. During all times material and relevant, Defendant discriminated against Plaintiff in the terms of conditions of the parties' Agreement, based on the Plaintiff's race and color, in the following ways:

a) Intentionally reporting a false claim there was a "past due" balance on the Plaintiff's mortgage; and

b) Intentionally reporting that there was an amount past due on the Plaintiff's mortgage.

16. Defendant engaged in these misrepresentations even though it had fixed the error regarding his credit because of his race.

17. Defendant intentionally decided to change Plaintiff's mortgage information back to the prior information which was incorrectly reported.

18. Defendant's conduct in so doing was wanton, willful, malicious and reckless, justifying an award for punitive damages, and claim is made therefore.

WHEREFORE, Plaintiff prays that this Honorable Court enter judgment in his favor and against Defendant, with a grant of compensatory damages, punitive damages, and such relief as this Court deems just and necessary.

**COUNT II**  
**FAIR CREDIT REPORTING ACT VIOLATION**

19. The preceding paragraphs 1 through 18 are incorporated herein by reference as though fully set forth herein at length.

20. The Defendant is reporting derogatory information about Plaintiff to one or more consumer reporting agencies (credit bureaus) as defined by 15 U.S.C. §1681a.

21. The Plaintiff received a loan modification from Wells Fargo in January of 2013, reducing the interest rate to 2% and reducing the monthly payment substantially.

22. In August of 2013, the mortgage was transferred to Defendant.

23. At all relevant times, Plaintiff made full, correct and timely payments to Defendant, Bayview, on the mortgage, as modified, but Defendant raised the interest rate to 3.125% and reported to consumer reporting agencies that Plaintiff was delinquent because he was not paying the amount required prior to modification.

24. Plaintiff orally, and in writing, advised the error, but Defendant never corrected the error.

25. Plaintiff has disputed the accuracy of the derogatory information reported by the Defendant to the Consumer Reporting Agency on multiple occasions.

26. Defendant has not responded to Plaintiff's letter correcting the error to Plaintiff nor the Consumer Reporting Agency.

27. Defendant has not provided notice of this disputed matter to the credit bureaus and is therefore in violation of 15 U.S.C. §1681s-2 which requires this notice.

28. Defendant has failed to comply with 15 U.S.C. §1692g in that it has not within 5 days of Plaintiff's initial communication (nor at any other time) sent Plaintiff written documentation of the amount of the debt, the name of the original creditor nor the other information required by the Fair Credit Reporting Act.

29. Defendant has failed to complete an investigation of Plaintiff's written dispute and provide the results of an investigation to Plaintiff within the 30 day period as required by 15 U.S.C. §1681s-2.

30. Defendant has not notified Plaintiff of any determination that Plaintiff's dispute is frivolous within the 5 days required by 15 U.S.C.

31. Plaintiff's credit has been damaged.

WHEREFORE, Plaintiff prays that this Honorable Court enter judgment in his favor and against Defendant, with a grant of compensatory damages, punitive damages, and such relief as this Court deems just and necessary.

**COUNT III**  
**BREACH OF SETTLEMENT AGREEMENT**

32. The preceding paragraphs 1 through 31 are incorporated herein by reference as though fully set forth herein at length.

33. During all times material and relevant hereto, the parties had entered into a contract for the resolution of the then-pending litigation.

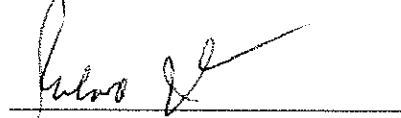
34. During all times material and relevant hereto, Defendant breached its obligation under the parties' Agreement.

35. Due to Defendant's breach, Plaintiff has suffered the harms and damages alleged hereinabove, including the loss of opportunity for further credit.

36. Defendant's actions were wanton, willful, intentional and reckless, thus warranting an award of punitive damages, and claim is made therefore.

WHEREFORE, Plaintiff prays that this Honorable Court enter judgment in his favor and against Defendant, with a grant of compensatory damages, punitive damages, and such relief as this Court deems just and necessary.

THE ORLOSKI LAW FIRM



Richard J. Orloski  
Attorney for Plaintiff  
Attorney ID No. 09857  
111 N. Cedar Crest Blvd.  
Allentown, PA 18104  
610-433-2363



BAIKOW LEGAL

A handwritten signature in black ink, appearing to read 'N. Baikow', is written over a horizontal line.

Nikolaus Baikow

Attorney for Plaintiff

Attorney ID No. 316445

122 N. 5<sup>th</sup> Street

Allentown, PA 18102

484-553-0192

# EXHIBIT A

# EQUIFAX

**CREDIT FILE : January 12, 2016**

**Personal Identification Information** (This section includes your name, current and previous addresses, and any other identifying information reported by your creditors.)

Name On File: Sherwood Dejeie  
 Social Security #: XXX-XX-6207 Date of Birth: September 14, 1979  
 Current Address: 8894 Pathfinder Rd, Breinigsville, PA 18031 (610) 530-1821 Reported: 01/2016  
 Previous Address(es): 820 Ward St Apt 8, Allentown, PA 18103 Reported: 11/2015  
 111 N Cedar Crest Blvd, Allentown, PA 18104 Reported: 11/2015  
 3630 Clauss Dr, Macungie, PA 18062 (610) 967-4636 Reported: 04/2014  
 207 Goepp St Apt 2f, Bethlehem, PA 18018 Reported: 04/2014

**ALERT(s): Extended Fraud Alert**

**File Blocked For Promotional Purposes**

Contact Information: Expiration Date: 02/11/2021 ; Date Reported: 02/09/2014 ;

**Collection Agency Information** (This section includes accounts that credit grantors have placed for collection with a collection agency.)  
 Receivables Management Systems; Collection Reported 11/2015; Assigned 10/2014; Creditor Class - Medical/Health Care; Client - Patient First; Amount - \$163 ; Status as of 11/2015 - Unpaid; Date of 1st Delinquency 05/2014; Balance as of 11/2015 - \$234 ; Individual Account; Account # - R800PAT0018974550; ADDITIONAL INFORMATION - Consumer Disputes  
 This Account Information: Collection Account; Address: 7206 Hull Street Rd Ste 21 Richmond VA 23235-5827 ; (804) 353-9300

**Credit Account Information**  
 (For your security, the last 4 digits of account number(s) have been replaced by \*) (This section includes open and closed accounts reported by credit grantors)

**Account Column Title Descriptions:**

Account Number	The Account number reported by credit grantor	Amount Past Due	The Amount Past Due as of the Date Reported
Date Acct. Opened	The Date that the credit grantor opened the account	Date of Last Payment	The Date of Last Payment
High Credit	The Highest Amount Charged	Actual Pay Amt	The Actual Amount of Last Payment
Credit Limit	The Highest Amount Permitted	Sched Pay Amt	The Requested Amount of Last Payment
Terms Duration	The Number of Installments or Payments	Date of 1st Delinquency	The Date of First Delinquency
Terms Frequency	The Scheduled Time Between Payments	Date of Last Activity	The Date of the Last Account Activity
Months Reviewed	The Number of Months Reviewed	Charge Off Amt	The Amount Charged Off by Creditor
Activity Designator	The Most Recent Account Activity	Deferred Pay Date	The 1st Payment Due Date for Deferred Loans
Creditor Class	The Type of Company Reporting The Account	Ballon Pay Amt	The Amount of Final(Balloon) Payment
Date Reported	Date of Last Reported Update	Date Closed	The Date the Account was Closed
Balance Amount	The Total Amount Owed as of the Date Reported		
Status	Condition of Account When Last Updated by Creditor or Otherwise		

**Account History**  
 Status Code  
 Descriptions

1 : 30-59 Days Past Due  
 2 : 60-89 Days Past Due  
 3 : 90-119 Days Past Due  
 4 : 120-149 Days Past Due

5 : 150-179 Days Past Due  
 6 : 180 or More Days Past Due  
 G : Collection Account  
 H : Foreclosure

J : Voluntary Surrender  
 K : Repossession  
 L : Charge Off

**Confirmation # 601203596**  
 Please address all future correspondence to:

www.investigate.equifax.com  
 Equifax Information Services LLC  
 Wwww.Equifax.Com/eca  
 Atlanta GA 30348  
 (800) 377-6568  
 M - F 9:00am to 5:00pm in your time zone.



**Bayview Loan Servicing** 4425 Ponce De Leon Blv Coral Gables FL 33146-1837 : (800) 457-5105

Account Number: 628000092\*  
 Date Reported: 11/12/2015  
 Balance: \$260,494  
 Amount: \$0  
 Past Due: \$0  
 Date of Last Payment: 10/20/2015  
 Actual Payment Amount: \$2,069  
 Scheduled Payment Amount: \$1,776  
 Status - Pays As Agreed: Type of Account - Mortgage; Type of Loan - Conventional Re Mortgage; Whose Account - Joint Account; ADDITIONAL INFORMATION - Consumer Disputes - Reinvestigation in Process.

**Historical Account Information**

Balance	Scheduled Payment Amount	Actual Payment Amount	Date of Last Payment	Actual Payment Amount	Scheduled Payment Amount	High Credit	Credit Limit	Amount Due	Type of Loan	Activity Designator
11/15	\$260,494	\$2,069	10/1/2015	\$260,881				\$0	Conventional Re Mortgage	

**Citizens Bank** 1 Citizens Dr Riverside RI 02915-3019 : (770) 454-4434

Account Number: 6636404711PA0\*  
 Date Reported: 11/11/2015  
 Balance: \$0  
 Amount: \$0  
 Past Due: \$0  
 Date of Last Payment: 09/20/2010  
 Actual Payment Amount: \$5,100  
 Scheduled Payment Amount: \$0  
 Status - Pays As Agreed: Type of Account - Installment; Type of Loan - Education Loan; Whose Account - Individual Account; ADDITIONAL INFORMATION - Account Transferred or Sold; Student Loan.

**FED Loan Servicing** PO Box 60610 Harrisburg PA 17106-0610 : (800) 699-2908

Account Number: 9053520350FDO\*  
 Date Reported: 12/31/2015  
 Balance: \$5,034  
 Amount: \$0  
 Past Due: \$0  
 Date of Last Payment: 12/20/2015  
 Actual Payment Amount: \$0  
 Scheduled Payment Amount: \$0  
 Status - Pays As Agreed: Type of Account - Installment; Type of Loan - Education Loan; Whose Account - Individual Account; ADDITIONAL INFORMATION - Student Loan - Payment with Status Codes 2

**FED Loan Servicing** PO Box 60610 Harrisburg PA 17106-0610 : (800) 699-2908

Account Number: 9053520350FDO\*  
 Date Reported: 12/31/2015  
 Balance: \$10,967  
 Amount: \$0  
 Past Due: \$0  
 Date of Last Payment: 12/20/2015  
 Actual Payment Amount: \$0  
 Scheduled Payment Amount: \$0  
 Status - Pays As Agreed: Type of Account - Installment; Type of Loan - Education Loan; Whose Account - Individual Account; ADDITIONAL INFORMATION - Student Loan - Payment with Status Codes 2

(Continued On Next Page)

# **EXHIBIT B**

# EQUIFAX

**CREDIT FILE : March 30, 2016**



**Personal Identification Information** (This section includes your name, current and previous addresses, and any other identifying information reported by your creditors.)

Name On File: Sherwood Dejoie

Social Security #: XXX-XX-6207 Date of Birth: September 14, 1979

Current Address: 8894 Pathfinder Rd, Breinigsville, PA 18031 (610) 530-1821 Reported: 03/2016

Previous Address(es): 820 Ward St Apt 8, Allentown, PA 18103 Reported: 03/2016

111 N Cedar Crest Blvd, Allentown, PA 18104 Reported: 03/2016

3630 Clauss Dr, Macungie, PA 18062 (610) 967-4636 Reported: 04/2014

207 Goepf St Apt 2f, Bethlehem, PA 18018 Reported: 04/2014

**ALERT(s): Extended Fraud Alert**

**File Blocked For Promotional Purposes**

Contact Information: Expiration Date: 02/11/2021 ; Date Reported: 02/08/2014 ;

**Collection Agency Information** (This section includes accounts that credit grantors have placed for collection with a collection agency.)

Unpaid: Date of 1st Delinquency 05/2014; Balance as of 11/2015 - \$234 ; Individual Account; Account # - R800PAT0018974550; ADDITIONAL INFORMATION - Consumer Disputes

This Account Information: Collection Account; Address: 7206 Hull Street Rd Ste 21 Richmond VA 23235-5827 ; (804) 353-9300

**Credit Account Information**

(For your security, the last 4 digits of account numbers have been replaced by \*) (This section includes open and closed accounts reported by credit grantors)

**Account Column Title Descriptions:**

Account Number - The Account number reported by credit grantor

Date Acct. Opened - The Date that the credit grantor opened the account

High Credit - The Highest Amount Charged

Credit Limit - The Highest Amount Permitted

Terms Duration - The Number of Installments or Payments

Months Reviewed - The Scheduled Time Between Payments

Activity Designator - The Number of Months Reviewed

Creditor Class - The Type of Company Reporting The Account

Date Reported - Date of Last Reported Update

Balance Amount - The Total Amount Owed as of the Date Reported

Status - Condition of Account When Last Updated by Creditor or Otherwise

Amount Past Due - The Amount Past Due as of the Date Reported

Date of Last Payment - The Date of Last Payment

Actual Pay Amt - The Actual Amount of Last Payment

Sched Pay Amt - The Requested Amount of Last Payment

Date of 1st Delinquency - The Date of First Delinquency

Date of Last Activity - The Date of the Last Account Activity

Charge Off Amt - The Amount Charged Off by Creditor

Deferred Pay Date - The 1st Payment Due Date for Deferred Loans

Balloon Pay Amt - The Amount of Final(Balloon) Payment

Date Closed - The Date the Account was Closed

**Account History**

**Status Code**

**Descriptions**

**Confirmation # 609005031**

Please address all future correspondence to:

www.investigate.equifax.com

Equifax Information Services LLC

Atlanta GA 30348

(800) 377-6568

M - F 9:00am to 5:00pm in your time zone.





**Bayview Loan Servicing**

4425 Ponce De Leon Blv Coral Gables FL 33146-1837 : (800) 457-5105

3/30/15

62800692*														
Account Number		Date Opened 12/01/2007 High Credit \$250,891 Credit Limit 28 Years Terms Duration Monthly Terms Frequency 28 Months Revd Activity Designator Creditor Classification												
Items As of		Balance	Amount	Past Due	Date of Last Payment	Actual Payment Amount	Scheduled Payment Amount	Date of 1st Delinquency	Date of Last Activity	Date Mtd Del. 1st Rptd	Charge Off	Deferred Pay	Balloon Pay	Balloon Pay Date
02/03/2016		\$259,456	\$8,472		01/2016	\$2,069	\$2,069	11/2015						
Status - 90 - 119 Days Past Due; Type of Account - Mortgage; Type of Loan - Conventional Re Mortgage; Whose Account - Joint Account; ADDITIONAL INFORMATION - ; Real Estate Mortgage: Conventional Mortgage;														
Account History		11/2015												
With Status Codes		3												

**Citizens Bank**

1 Citizens Dr Riverside RI 02915-3019 : (770) 454-4494

6636404711PA0*													
High Credit		Credit Limit		Terms Duration		Terms Frequency		Months Revd		Activity Designator		Creditor Classification	
08/01/2009		\$5,100		Monthly		12		Transfer/Sold					
Items As of	Balance	Amount	Date of	Actual	Scheduled	Date of	Date of	Date Mail	Charge Off	Deferred Pay	Balloon Pay	Balloon	Date
11/11/2015	\$0	Past Due	09/2010	Payment Amount	Payment Amount	Last Payment	Delinquency	Del. 1st Rptd	Amount	Start Date	Amount	Pay Date	Closed
Status - Pays As Agreed; Type of Account - Installment; Type of Loan - Education Loan; Whose Account - Individual Account; ADDITIONAL INFORMATION - Account Transferred or Sold; Student Loan;													

**FED Loan Servicing**

PO Box 50610 Harrisburg PA 17106-0610 : (800) 699-2908

9053520350FDO*	01/12/2010	\$3,500																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																				
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**Historical Account Information**

Balance	Scheduled Payment Amount	Actual Payment Amount	Date of Last Payment	High Credit	Credit Limit	Amount Past Due	Type of Loan	Activity Designator
02/16	No Data Available							
01/16	\$5,034			\$3,500		\$0	Education Loan	

Additional Information: Student Loan - Payment Deferred

(Continued On Next Page)